... unites Ontario's municipalities

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AMO's Response to *Measuring Progress Towards Ontario's Waste Reduction Targets*

Association of Municipalities of Ontario

August 1992

MISSION STATEMENT

AMO unites Ontario's municipalities.

We take pride in promoting, supporting and enhancing strong and effective municipal government.

We provide strategic leadership by:

- developing and effectively promoting responsive quality policy;
- informing and educating governments, the media and the public;
- marketing innovative and beneficial services.

Our elected representatives, municipal officials and association staff form a team which values and respects:

- diversity and local autonomy;
- fairness and equity;
- consultation;
- consensus;
- co-operation.

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EXECUTIVE SUMMARY

Introduction

Measuring Progress Towards Ontario's Waste Reduction Targets is the fourth in a series of Initiatives Papers prepared by the Province on topics related to reducing and managing Ontario's wastes. It provides guidance for monitoring progress toward achieving the Province's waste reduction targets which were established in February 1991 to decrease waste going to disposal by at least 25 per cent in 1992 and at least 50 per cent by the year 2000. The paper proposes how to measure waste diversion, monitor the waste management system and create a waste management information system.

AMO's General Comments

AMO agrees in principle with the objectives of monitoring the waste management system. However, the Association has several concerns which must be addressed prior to the implementation of a waste measuring and monitoring system.

The paper's key proposal is that municipalities and the private sector will be required by regulation to report to the Province on the quantities of different standard material types received at waste disposal and diversion facilities. This places a new mandatory requirement on the municipal sector. AMO does not support the proposed monitoring system subject to the resolution of some key concerns. First, the Association is concerned about the administrative practicality of implementing the proposed measuring and monitoring system. The system will impose increased staffing and resource requirements on municipalities. The financing of this system must therefore be addressed and resolved. But first and foremost, AMO is not convinced that the detailed information which municipalities will be required to collect is necessary to meet the stated objectives. The Association believes that the Province must demonstrate that the time and resources which will be committed to compiling this information will have measurable benefits.

Alternative Proposals

AMO suggests that a more efficient and practical monitoring system can be designed. The Association makes the following proposals:

Establish Models and Profiles of Similar Communities	Greater efficiency and practicality can be introduced into the measuring and monitoring system. For example, comparisons of similar municipalities should be considered instead of instituting a system where all municipalities will be required to compile data on the tonnes of material by standard material classes processed by each disposal and diversion facility.
Test Pilot Projects	Pilot projects should be used to test the practicality and feasibility of implementing the information collection system. It is AMO's understanding that the Waste Reduction Office has produced draft reporting forms. AMO recommends that the WRO test the voluntary forms in select pilot projects to assess the feasibility of the proposed reporting requirements.
Develop Monitoring System Together With Options for the Regulation of the Flow of Waste	The measuring and monitoring system is an important component of the regulation of the flow of waste. In its response to the Ministry of Municipal Affair's consultation paper, *Waste Management Powers in Ontario*, the Association supported that municipalities should have powers to control the flow of waste generated within their boundaries. AMO noted that this would permit municipalities to develop and implement comprehensive strategies for the entire waste stream. They could then monitor the degree to which waste reduction targets are being met in the municipality. It would also allow private/public sector co-ordination in developing facilities so all facilities would be assured of a supply of waste and the risk would be reduced. AMO did not support any of the options provided in the paper and recommended that further discussion of options for regulating the flow of waste be conducted. Clearly, a measuring and monitoring system is a required part of the regulation of the flow of waste; the two should therefore be developed in concert.
Place Onus on Industry	Certificates of Approval (C of A's) for IC&I material recovery facilities should include as a condition that information on materials processed be provided to the Province. This will place the onus on industry to also comply with a monitoring system.
Resolve Financial Responsibilities	The development of a regulatory system for measuring and monitoring waste disposal and diversion should be conditional upon the resolution of financial responsibilities for waste management.

1 INTRODUCTION

Measuring Progress Towards Ontario's Waste Reduction Targets is the fourth in a series of Initiatives Papers prepared by the Province on topics related to reducing and managing Ontario's wastes. It provides guidance for monitoring progress toward achieving the Province's waste reduction targets which were established in February 1991 to decrease waste going to disposal by at least 25 per cent in 1992 and at least 50 per cent by the year 2000. The paper proposes how to measure waste diversion, monitor the waste management system and create a waste management information system.

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2 MEASURING WASTE DIVERSION

The following considerations to be utilized in measuring waste diversion are discussed in the paper:

- Measurements must take into account factors affecting waste diversion such as demographic and socioeconomic factors, changes in production levels, automation, employee numbers, sales revenues, product design and markets. The MOE will be taking these variables into account when reporting diversion figures and making projections for diversion.
- Two ways of measuring progress are identified: the per capita diversion rate and the absolute diversion rate.
- The unit of measure will be weight in metric tonnes.
- The MOE will be using the per capita diversion rate to monitor the attainment of targets on a province-wide basis.
- While the targets apply to planning and monitoring progress in the province as a whole, the paper states that both the municipal and industrial, commercial and institutional (IC&I) sectors have expressed an interest in planning and monitoring their individual contributions. Municipalities may use the per capacity diversion rate to measure their own progress. The use of the absolute diversion rate will assist in the sizing of waste management facilities.
- The IC&I can use the absolute diversion rate; MOE is working with representatives of this sector to determine appropriate adjustments for factors such as changing market shares, product mix or automation.

AMO's Comments

AMO supports these proposed measuring tools.

3 WASTE MANAGEMENT SYSTEM MONITORING

Currently the Ministry monitors materials received at municipally-operated waste disposal facilities. Regulations are being considered to require reporting from disposal and diversion facilities operated by private waste managers. In addition, waste and secondary material handled by material recovery and central compost facilities will also be tracked as will materials shipped from material recovery facilities to secondary markets, exports and imports.

Waste Management Information System

It is noted that in addition to monitoring, the data can be used to assist municipalities and IC&I organizations in the following ways:

- to identify feasible waste diversion options;
- to identify secondary market opportunities;
- to assist in developing waste management systems plans;
- to support waste exchanges; and
- to develop and evaluate technical and funding support programs.

Data reports on waste disposal and diversion facilities will form part of an overall waste management information system with the following several components:

- 27 standard material classes as the basis on which waste diversion initiatives can be monitored.

- Data Collection: The paper states that regulations to require reporting to the Ministry on the quantities of materials received by waste disposal and diversion facilities are being considered. The regulations would require that both municipal and private owners of waste processing and disposal facilities report the tonnes by material type (standard material classes) processed by each facility in the reporting period. The reports would also have to indicate the source sector of the materials. The paper states that facilities with weigh scales which serve municipalities whose population exceeds 100,000 will be required to report monthly; quarterly reports will be required from others. Facilities

without weigh scales which can estimate tonnages will be required to make quarterly reports. The Ministry will work with municipalities to develop estimates of waste disposed.

- Database: the MOE will maintain a database of materials diverted and disposed of by facility, standard material classes, waste management methods, and relevant municipal and facility data.

- Waste diversion information system (WDIS): waste diversion data including an inventory of waste processing facilities, monitoring 3Rs funding programs, etc. will be provided on-line by 1993 to provide electronic data exchanges for both submitting and retrieving data.

- Forecasting models: the Ministry is developing methods to estimate 3Rs diversion tonnages for those areas without weigh scales or other accurate monitoring methods can use these to estimate disposal and diversion.

- Communicating Progress: the MOE will report the provincial diversion and disposal totals on a quarterly basis as well as other information diversion opportunities and case studies..

4 AMO'S POSITION ON MEASURING PROGRESS

AMO agrees in principle with the objectives of monitoring the waste management system. In particular, the Association recognizes the importance of measurement in achieving the objectives of the first task of the waste management system planning study, that is the assessment of problems and opportunities. This includes a description of the current waste management system for municipal solid waste including residential and IC&I waste; and the identification of projected waste generation rates, opportunities for markets to divert waste from disposal, and the waste quantities requiring management.

However, AMO is concerned with the practicality of the proposals for information collection which will impose the following challenges and difficulties for municipalities:

- Some municipalities have kept good historical records; however, in many cases (especially in smaller municipalities) municipalities have not kept records. It is therefore unlikely that the base year information required to measure diversion rates will be available in many instances.

- 27 standard material classes are identified. Materials received at waste disposal and diversion facilities will have to be sorted and weighed for reporting purposes. The Association questions the feasibility of doing this; for example IC&I trucks are often carrying several IC&I customers' waste and would pose a particular challenge for sorting and weighing. AMO also questions how accurate the reporting of this number of standard classes would be in any event.

- The sorting of materials at waste disposal and diversion facilities may have occupational health and safety implications which must be addressed.

- There will be additional administrative costs incurred for monitoring for both the municipal and private sector. For the private sector this will likely result in operators increasing private tipping fees to account for costs and time of segregating materials, and reporting. For the municipal sector, this will also mean increased staffing and administrative costs. As in previous responses of the Association to the Ministry's initiative papers, AMO is hesitant to support recommendations on regulatory changes independent of addressing the overall financing of the waste management system.

The concerns about the administrative practicality of collecting the information and the financing of these costs raise a fundamental question: what use will this detailed information serve and what will be the return on the investment of time and resources? The cost-benefit of the proposal needs to be weighed to ensure that resources are wisely allocated to this task. AMO is therefore not convinced that the detailed information which municipalities will be required to collect is necessary to meet the stated objectives. The Association believes that the Province must demonstrate that the time and resources which will be committed to compiling this information will have measurable benefits.

4.1 Alternative Proposals

AMO suggests that a more efficient and practical monitoring system can be designed. In making this recommendation, the Association starts by asking how much can reasonably be achieved to meet the stated objectives of monitoring?

Establish Models and Profiles of Similar Communities

Greater efficiency and practicality can be introduced into the measuring and monitoring system. For example, comparisons of similar municipalities should be considered instead of instituting a system where all municipalities will be required to compile data on the tonnes of material by standard material classes processed by each disposal and diversion facility.

In its response to Initiatives Paper No. 2 on the waste management master planning system, AMO proposed generic waste composition models for different categories of municipalities. These would comprise off-the-shelf data bases and would not require each individual municipality to collect original data.

The Ministry's proposed forecasting models to estimate disposal and diversion tonnages could be the basis on which to develop generic waste composition models. These could be validated by selective monitoring.

1987 as a base year is reasonable. In cases where there is no historical data, the information from municipalities with a similar community profile could be used.

Test Pilot Projects

Pilot projects should be used to test the practicality and feasibility of implementing the information collection system.

It is AMO's understanding that the Waste Reduction Office has produced draft reporting forms. AMO recommends that the WRO test the voluntary forms in select pilot projects to assess the feasibility of the proposed reporting requirements.

Develop Monitoring System Together With Options for the Regulation of the Flow of Waste

The measuring and monitoring system is an important component of the regulation of the flow of waste. In its response to the Ministry of Municipal Affair's consultation paper, *Waste Management Powers in Ontario*, the Association supported that municipalities should have powers to control the flow of waste generated within their boundaries. AMO noted that this would permit municipalities to develop and implement comprehensive strategies for the entire waste stream. They could then monitor the degree to which waste reduction targets are being met in the municipality. It would also allow private/public sector co-ordination in developing facilities so all facilities would be assured of a supply of waste and the risk would be reduced. AMO did not support any of the options provided in the paper and recommended that further discussion of options for regulating the flow of waste be conducted. Clearly, a measuring and monitoring system is a required part of the regulation of the flow of waste; the two should therefore be developed in concert.

Place Onus on Industry

Certificates of Approval (C of A's) for IC&I material recovery facilities should include as a condition that information on materials processed be provided to the Province. This will place the onus on industry to also comply with a monitoring system.

Resolve Financial Responsibilities

The development of a regulatory system for measuring and monitoring waste disposal and diversion should be conditional upon the resolution of financial responsibilities for waste management.

This is consistent with AMO's position on the other regulations proposed in the MOE's Initiatives Paper which have major cost implications for municipalities. None of these implications has been addressed. The MOE staff have advised that the Initiatives Paper on "who pays" for Ontario's waste management system will not be ready for consultation with AMO until the late Fall of 1992. As stated previously, the development of new regulatory requirements must be addressed in the context of "who pays." Therefore it is both difficult to offer full comment on the regulations in this and other Initiatives Paper and to determine how these regulations will impact municipalities without the accompanying financial information.

AMO has also stated that the Ontario government should release the municipal cost impact statements in particular for any mandatory programs. AMO has also argued that this information should be made available to AMO and municipalities before the Province takes any further steps to make these programs mandatory.

AMO has therefore consistently communicated the position that the MOE not proceed with the introduction of its regulations until municipalities have been able to: a) consider together both the regulations and their accompanying funding package, and b) respond as to how these can be financially implemented.

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APPENDIX A - ACKNOWLEDGMENTS

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